

ECF CASE  
JUDGE KOELTL

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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**J & J SPORTS PRODUCTIONS, INC.**, as  
Broadcast Licensee of the **May 5, 2007**  
**DeLaHoya/Mayweather** Program,

Plaintiff,  
-against-

TEODORO SHULTERBRON, Individually, and as  
officer, director, shareholder and/or principal of  
THINK INC. d/b/a THEO'S THINK INC. SPORTS  
a/k/a THEO'S SPORTS BAR,

and

THINK INC. d/b/a THEO'S THINK INC. SPORTS  
a/k/a THEO'S SPORTS BAR

Defendants.

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STATE OF NEW YORK :  
: SS.:  
COUNTY OF ULSTER :

JULIE COHEN LONSTEIN, being duly sworn, deposes and says:

1. That I am the attorney for plaintiff, **J & J SPORTS PRODUCTIONS, INC.**, in the  
above referenced matter and I am admitted to practice in this Court. I am fully familiar with all  
the facts, circumstances and proceedings heretofore had herein.

2. This action was commenced pursuant to 47 U.S.C. §605, *et seq.* A copy of the  
Summons and Complaint was served on Defendant, **TEODORO SHULTERBRON**,  
**Individually, and as officer, director, shareholder and/or principal of THINK INC. d/b/a**  
**THEO'S THINK INC. SPORTS a/k/a THEO'S SPORTS BAR**, as set forth in the proof of  
service by Noel B. Glastein, ECF Document No. 3 **and THINK INC. d/b/a THEO'S THINK**  
**INC. SPORTS a/k/a THEO'S SPORTS BAR**, as set forth in the proof of service by Jessica

**AFFIDAVIT IN SUPPORT OF  
REQUEST FOR DEFAULT**  
Civil Action No. 07-CV-6529-JGK-KNF  
HON. JOHN G. KOELTL

Miller, ECF Document number 4.

3. The time within which any of the Defendants may answer or otherwise move with respect to the Complaint herein has expired. Defendants **TEODORO SHULTERBRON, Individually, and as officer, director, shareholder and/or principal of THINK INC. d/b/a THEO'S THINK INC. SPORTS a/k/a THEO'S SPORTS BAR, and THINK INC. d/b/a THEO'S THINK INC. SPORTS a/k/a THEO'S SPORTS BAR**, while the Defendants appeared at the November 2, 2007, Order to Show Cause for Default Judgment, where the Honorable John G. Koeltl granted an extension of time to answer until November 30, 2007, Defendants have not answered or otherwise moved with respect to the Complaint; and the time for the Defendant(s) to do so has not been extended.

4. Said Defendant(s) are not infants or incompetents. Upon information and belief, Defendant(s) are not presently in the military service of the United States.

**WHEREFORE**, Plaintiff **J & J SPORTS PRODUCTIONS, INC.**, requests that the default of the Defendant(s) **TEODORO SHULTERBRON, Individually, and as officer, director, shareholder and/or principal of THINK INC. d/b/a THEO'S THINK INC. SPORTS a/k/a THEO'S SPORTS BAR, and THINK INC. d/b/a THEO'S THINK INC. SPORTS a/k/a THEO'S SPORTS BAR**, be noted and that judgment be entered in favor of plaintiff and against defendants in the manner stated herein.

Dated: March 6, 2008  
Ellenville, NY 12428

Sworn to before me this 6<sup>th</sup>  
day of March 2008

/S/ Julie Cohen Lonstein

Julie Cohen Lonstein  
Bar Roll No. JL8512

/s/ April Draganchuk  
**April Draganchuk**  
**Notary Public State of New York**  
**Registration No. 4945872**  
**Residing in Ulster County**  
**My Commission Expires Jan. 27, 2011**